

The comments in the following pages were prepared by the Enterprise RTO Association (ERTO) in response to an invitation to provide stakeholder response to the following draft AQF Council document.

**AQF Qualification Issuance Policy and Protocols**  
**September 2009**

These comments are provided in response to the following request for stakeholder views.

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### AQF Issuance Policy Final Draft for consultation

The AQF Council's Terms of Reference require it to review and revise the AQF in consultation with key stakeholders as part of its responsibility to maintain the AQF.

The AQF Council has identified that the existing issuance policy 'Issuing a Qualification' detailed in The AQF Implementation Handbook, needs to be reviewed to improve the clarity of information provided about AQF qualifications - especially to graduates and employers - to increase the protection of AQF qualifications, and to ensure consistent application across all education and training sectors.

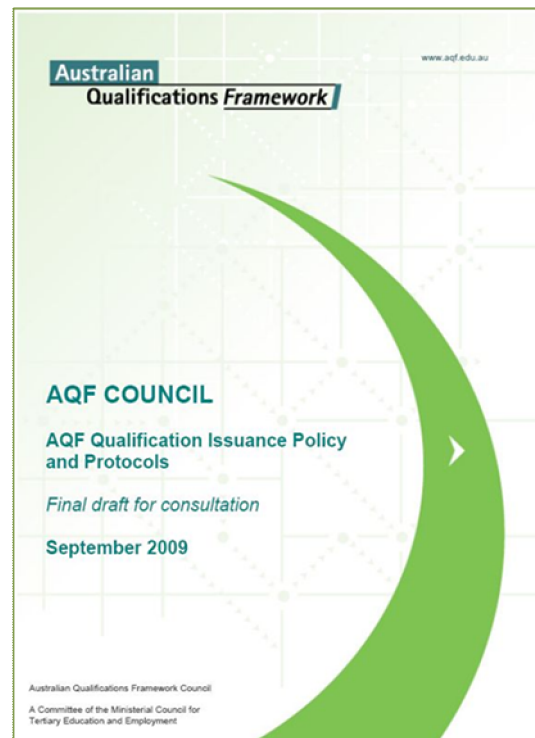
The review of this policy is being considered in the context of the AQF Council's work on strengthening the AQF.

The AQF Council has endorsed a draft policy for consultation - Qualification Issuance Policy and Protocols - and is now seeking stakeholder views on the proposed policy.

The consultation period closes on Friday 27 November 2009.

Written comments can be sent to the AQF Council [aqfc@saugov.sa.gov.au](mailto:aqfc@saugov.sa.gov.au)

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In summary ERTOA members have expressed broad support for the draft qualification issuance policy and protocols proposed in the document. However, the Association's members strongly reject the proposed implementation of a mandatory 'Australian Graduation Statement' as described in Section 2.6.2. Detailed comments are provided in the following pages.



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President  
Enterprise RTO Association  
23<sup>rd</sup> November 2009

## 1. INTRODUCTION

### 1.1 Intent and purpose of the policy and protocols

Supported – no additional comments

### 1.2 Scope of the policy and protocols

Supported – no additional comments

### 1.3 Users of the policy and protocols

Supported – no additional comments

### 1.4 Definitions of key terms in the policy and protocols

Modify or delete the current definition of 'Australian Graduation Statement' – See comments at 2.6.2.

## 2. POLICY and PROTOCOLS

### 2.1 Issuance Policy

ERTO A does not support the format and content of the supplementary Australian Graduation Statement proposed in this paper, nor does it support any mandatory requirement for its issue.

ERTO A recommends modifying the first paragraph of this section to read:

On achieving a qualification, a graduate will receive the following certification documentation:

- A certification document
- An academic transcript.

### 2.2 Protection of qualifications

Supported – no additional comments

### 2.3 Responsibility for issuing, authenticating and verifying qualifications

ERTO A recommends adding the following statement to the end of this section:

'Presentation of an AQF qualification certification document should not be accepted as evidence authenticating and verifying the possession of a qualification unless this has been confirmed via direct contact with the authorised issuing organisation identified on the document.'

## 2.4 Use of the AQF logo protocols

Supported – no additional comments

## 2.5 Certification documentation protocols

### 2.5.1 Qualification certification document form and content

ERTO A recommends removal of the 'unique issuance number' as a mandated element of the AQF qualification certification document.

Certification documentation (parchments/testamurs/certificates) are no longer individually prepared and signed using stocks of registered (uniquely numbered) 'copy-proof' award templates securely stored away until required for use. Digitised signatures, and the ready availability of other graphic design tools, now enable 'testamurs' to be printed and issued on-demand using blank paper stock. They are also readily copied and forged. Possession of a 'testamur' no longer provides convincing evidence that the individual actually holds the qualification. Claims of possession of a qualification should only be accepted after authentication and verification with the authorised issuing organisation – the key bits of information required for this check are:

- The name of the individual claiming to possess the qualification
- The name of the qualification, and
- The date of issue.

The addition of a unique issuance number adds little in reality to the authentication and verification process to justify the cost and effort of creating and maintaining a 'unique issuance number' register and may even instil a false sense of security. Whilst some ERTOA members currently use processes that allocate a unique issuance number to qualification certification most members support the view it is unnecessary and should only be used on a voluntary basis by those authorised issuing organisations who may see some benefit in its inclusion

### 2.5.2 Statement of attainment form and content

See comments at section 2.5.1 above.

### 2.5.3 Replacement certification documentation

Supported – no additional comments

## 2.6 Supporting document protocols

### 2.6.1 Academic transcript required form and content

Supported – no additional comments

### 2.6.2 Australian Graduation Statement

ERTO A members strongly reject the implementation of the proposed mandatory supplementary Australian Graduation Statement.

The AQF council, through its policy, protocols, and Implementation Handbook seeks to establish and maintain the integrity, reputation and value of Australian qualifications. The core objective of this effort is consistency – the true value of an AQF qualification is solely determined by its positioning within the qualification framework. It should not matter whether the qualification was issued by a TAFE college, a private provider or an enterprise RTO – they are all equal if they have been duly authorised by the appropriate accrediting

authorities and meet the required standards. The proposed Australian Graduate Statement appears to contradict this ideal by implying that the value of the qualification will be enhanced by the provision of information about the issuing organisation or additional information about the graduate, not directly associated with the qualification. It is inevitable that the Statement will quickly degenerate into little more than a marketing tool unless a robust process is in place to approve and monitor the content. ERTOA is not convinced this is an area State and Territory accrediting authorities would care to enter!

ERTO A has no problem with individual providers preparing and issuing these types of 'qualification enhancing' statements on a voluntary basis.

If the AQF council feels that national and international stakeholders need to know more about qualifications then ERTOA recommends that AQF prepare a suitable 'information brief' for each qualification (based upon or extracted from the detailed descriptions in the AQF Implementation Handbook, and prepared with appropriate industry and provider consultation). There would then be a single AQF approved national 'information brief' for each qualification, and ERTOA members would have no objection if the issue of this standard brief to all graduates was mandated.

## **2.7 Qualification titles, abbreviations and post nominals protocols**

Supported – no additional comments

### **2.7.1 Post nominals**

Supported – no additional comments

## **2.8 Honorary awards**

Supported – no additional comments

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*...End of ERTOA comments*